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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 WILLIAM B. COWEN, Regional
13 Director of Region 21 of the National
14 Labor Relations Board, for, and on
15 behalf of, the NATIONAL LABOR
RELATIONS BOARD,

16 Petitioner,

17 v.

18 PACIFIC GREEN TRUCKING, INC.

19 Respondent.

Civil No. 2:19-CV-00663-AB-(RAOx)

DECLARATION OF MATHEW
SOLLETT IN SUPPORT OF
MOTION SEEKING CONTINANCE
OF HEARING DATE

20
21 I, Mathew Sollett, counsel for Petitioner, hereby declare that good cause exists
22 to continue the hearing in the above-captioned matter from March 8, 2019 until
23 March 29, 2019 for the following reasons:

- 24 1. On the date Petitioner filed his initiating documents in this matter, January
25 29, 2019, Petitioner believed Respondent, Pacific Green Trucking, Inc., was
26 unrepresented in this proceeding before the District Court. To date,
27 Petitioner has received no notice that Respondent is represented in this
28 matter.

- 1 2. On January 31, 2019, Petitioner notified Respondent through a Notice of
2 Motion that Petitioner would petition this Court for the issuance of an Order
3 Granting Temporary Injunction under Section 10(j) of the National Labor
4 Relations Act, as amended, against Respondent on March 8, 2019 at
5 10:00am.
- 6 3. As reflected in previous declarations of service made to this court, Petitioner
7 has served all documents related to this matter directly on Respondent.
- 8 4. To date, Respondent has failed to serve or file any documents related to this
9 matter.
- 10 5. As reflected in a declaration of service filed concurrently with the present
11 declaration, on February 20, 2019, Petitioner served by UPS Overnight
12 delivery all documents related to this matter on Karen Rose, J.D. and Nathan
13 Sweet, Esq. Rose, a non-attorney labor relations consultant, and Sweet, an
14 out-of-state attorney, represented Respondent in an administrative hearing
15 before the National Labor Relations Board held on January 14 and 15, 2019.
16 Petitioner served these documents on Rose and Sweet, prior to March 8,
17 2019, in an effort to ensure Respondent has a sufficient opportunity to
18 participate in this matter.
- 19 6. In further effort to ensure Respondent has a sufficient opportunity to
20 participate in this matter, Petitioner now moves the Court to continue the
21 hearing in this matter to March 29, 2019 at 10:00am or as soon thereafter as
22 counsel can be heard.
- 23 7. Petitioner has not previously requested any continuances related to this
24 matter.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated at Los Angeles, this 21st day of February, 2019.



Mathew Sollett
Counsel for Petitioner